

ANDREA BEATTY RINKER
Director



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

7272 Cleanwater Lane, LU-11 • Olympia, Washington 98504-6811 • (206) 753-2353

May 1, 1985

*Gray Harbor
City of Hoquiam
Landfill*

*HQSF
5/1/1985*

Mr. Dennis Priebe, Director
Department of Public Works
City of Hoquiam
City Hall
Hoquiam, Washington 98550

Dear Mr. Priebe:

Hoquiam Landfill, (Grays Harbor County)

This letter will address the comprehensive comments and recommendations of the Southwest Regional Office (SWRO) of the Washington Department of Ecology (WDOE) from the December 3, 1984 WDOE inspection and subsequent file review of the subject landfill.

Enclosed please find a copy of the December 3, 1984 site inspection form and sample analyses data from that inspection.

SITE OPERATION

The City of Hoquiam should develop a new landfill operation plan. Particular operational issues of concern are noted below.

1. Fill face - Exposed acreage used for summer/winter filling appears too large contributing to generation of excessive quantities of contaminated stormwater. Sequential filling of the site should be considered to optimize site life and management.
2. Stormwater - Contaminated stormwater is ponded onsite and discharged into the leachate grit chamber which discharges to the Hoquiam Sewage Treatment Plant (STP). Operation of the grit chamber appears ineffective due to the increased flows contributed by the contaminated stormwater which were apparently not considered in the grit chamber's design.

Diversion of clean springwater/stormwater at the upper end of the facility through the landfill is a large concern. The WDOE files do not document the alignment or construction of the clean stormwater diversion pipeline. Use of wood stave pipe for diversion of the water through the fill is documented and a concern due to it's potential for water loss and generation of subsurface leachate. This concern should be incorporated into the required geohydrological study of the landfill. Are the locations of the springs documented?

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3. Access - Upgrade of the landfill's access road should be considered along with a revised filling plan. The current haul road is steep and narrow and provides limited turnarounds and access to the entire fill area.
4. Fill compaction - A compactor is recommended to replace the bulldozer now used to work the fill. Compactors can attain higher compaction rates than bulldozers.
5. Safety - Communication ability from the operator on the fill to the landfill office is recommended. Regular safety meetings between landfill operators and city garbage truck drivers to discuss emergency procedures is advised.

MONITORING/WATER QUALITY

During the December 3, 1984 inspection, I sampled the stormwater pond discharge to the leachate grit chamber, the west well (DH-1 on March 7, 1984 well log) and site runoff to the Hoquiam River at the inlet to the Highway 101 culvert, north of the landfill entrance. Inspection of the flow system discharging to the Hoquiam River that day revealed that the majority of flow came from springs in the toe of the slope adjacent to the highway. The south clean stormwater ditch was contributing flow to the highway culvert, but the north stormwater ditch was dry. The land area at the toe of the slope is reportedly "old landfill" and had the appearance of such.

Review of the water quality data for the collected samples demonstrates that all three samples were contaminated by landfill leachate. Results of the total organic halogens test to determine potential loss from Most Western Laundry, Inc., sludge disposed of onsite were negative for the west well (DH-1) and the stormwater pond discharge to the grit chamber. The data for the west well indicates violations of Washington State drinking water standards for primary contaminants cadmium and turbidity and secondary contaminants iron, manganese, color, specific conductivity and total dissolved solids. Metals violations above are based on the total dissolved metals data and are therefore a conservative judgement.

In consideration of the above, the current Hoquiam landfill monitoring program, and data on file with the WDOE, I recommend Hoquiam pursue development of a revised monitoring plan as part of the geohydrological report required by condition number two of the 1985 Hoquiam solid waste disposal permit. The revised plan should address:

1. Designation of site sampling points to incorporate the "springs" at the toe of the landfill property.
2. Establishment of a background well.

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3. An assessment of the location, construction methods and viability of the existing wells onsite (DH-1&2) as downgradient groundwater monitoring wells.
4. Coordination and compliance with the new Washington State Minimum Functional Standards for Solid Waste Handling, WAC 173-301. The present draft, WAC 173-301, is slated for adoption in September 1985.
5. Sampling of each discharge into the leachate grit chamber.
6. Providing for accurate flow measurements to be taken during sample collection at the grit chamber.
7. Sampling of the clean spring/stormwater from the upgradient and/or downgradient end of the landfill, if possible, to determine volume and quality impacts.

OTHER CONSIDERATIONS

The SWRO of the WDOE has recently been notified that the Environmental Protection Agency (EPA) has decided to regulate the Hoquiam landfill as a Resource Conservation and Recovery Act (RCRA) hazardous waste disposal site due to documentation concerning disposal of Most Western Laundry Inc., sludge at the landfill. The WDOE will accompany EPA on a future RCRA inspection of the landfill. The inspection date has not yet been scheduled.

The sampling data from December 3, 1984 provides the SWRO of the WDOE with the proper evidence to recommend issuance of a formal regulatory order to the City of Hoquiam for violation of the Water Pollution Control Law, RCW 90.48. The purpose of the regulatory order would be to establish a compliance schedule for necessary engineering evaluation of and construction upgrades to the Hoquiam landfill to preclude further violations of RCW 90.48. At this time, I believe it is in everyone's best interest, to request that the City of Hoquiam, the Grays Harbor Health Department, and the WDOE, meet to discuss issues and concerns relative to the Hoquiam landfill. I will be contacting you by phone to establish a mutually acceptable meeting date in early May 1985.

Please call me at 753-3275 in Olympia if you have any questions.

Sincerely,

Brett Betts

Brett Betts
Senior Inspector
Hazardous/Solid Waste Section

BB:dc

Enclosure

cc: Debbie Yeager, Grays Harbor Health Department

ROUTING AND TRANSMITTAL SLIP		Date
		12/03/86
TO: (Name, office symbol, room number, building, Agency/Post)	Initials	Date
1. George Hofer RCRA Permits		
2. Chuck Rice 2 MTS 533		
3. I'm not sure you		
4. George - I've no idea where the statement came from → possibly Ecology only.		
5.		
Action	File	Note and Return
Approval	For Clearance	Per Conversation
As Requested	For Correction	Prepare Reply
Circulate	For Your Information	See Me
Comment	Investigate	Signature
Coordination	Justify	

REMARKS

Re: Haguian Landfill

I'm not even certain the sludge is under 261.

Please see page 3 of the attached letter. Is RCRA going to regulate this landfill? This letter of May 1, 1985 was included in documentation attached to the Preliminary Assessment done by Ecology.

DO NOT use this form as a RECORD of approvals, concurrences, disposals, clearances, and similar actions

FROM: (Name, org. symbol, Agency/Post)

Room No.—Bldg.

Debbie Flood

Phone No.

2722

Debbie Flood

Neither Chuck Rice nor I have any idea where this statement came from.

ef
1/9/87